information now known to the responding party or to counsel. These responses are given without prejudice to production at trial of subsequently discovered information, or information omitted from the responses as a result of good faith oversight. These answers may include hearsay and other matters,

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On the day of the incident, defendant Alcantar physically attacked plaintiff Benjamin Ortega in front of his brother Miguel. He grabbed him and forced him to the ground, inflicting bodily injury to him.

INTERROGATORY No. 2:

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Defendant Alcantar and his partner, B. Ortiz entered plaintiffs' property, and attacked and handcuffed plaintiffs. Approximately eight other officers in two police vans assisted Alcantar and Ortiz to place plaintiffs under arrest.

INTERROGATORY No. 3:

Defendant Alcantar and his partner, B. Ortiz, without probable cause to believe that plaintiff or anyone else on the property was or had been involved in any crime, entered onto the private property where plaintiff was standing and physically attacked him.

INTERROGATORY No. 4:

See response to interrogatory No. 3, above.

INTERROGATORY No. 5:

Defendant Alcantar and his partner, B. Ortiz, without probable cause to believe that plaintiff was, or had been involved in any crime, handcuffed and arrested plaintiff, depriving him of his liberty.

INTERROGATORY No. 6:

See response to interrogatory No. 5, above.

INTERROGATORY No. 7:

On the day of the incident, plaintiff Benjamin Ortega was lawfully crossing the street carrying a Mexican flag. Defendant Alcantar and his partner, B. Ortiz, were driving a marked City police car. They stopped at the red light while plaintiff crossed in front of them. While plaintiff was crossing on the green light, he was accosted by defendant Alcantar, who told him to "hurry up, or I'll put that flag up your ass."

INTERROGATORY No. 8:

See response to interrogatory No. 7, above.

INTERROGATORY No. 9:

See response to interrogatory No. 3, above.

INTERROGATORY No. 10:

See response to interrogatory No. 3, above.

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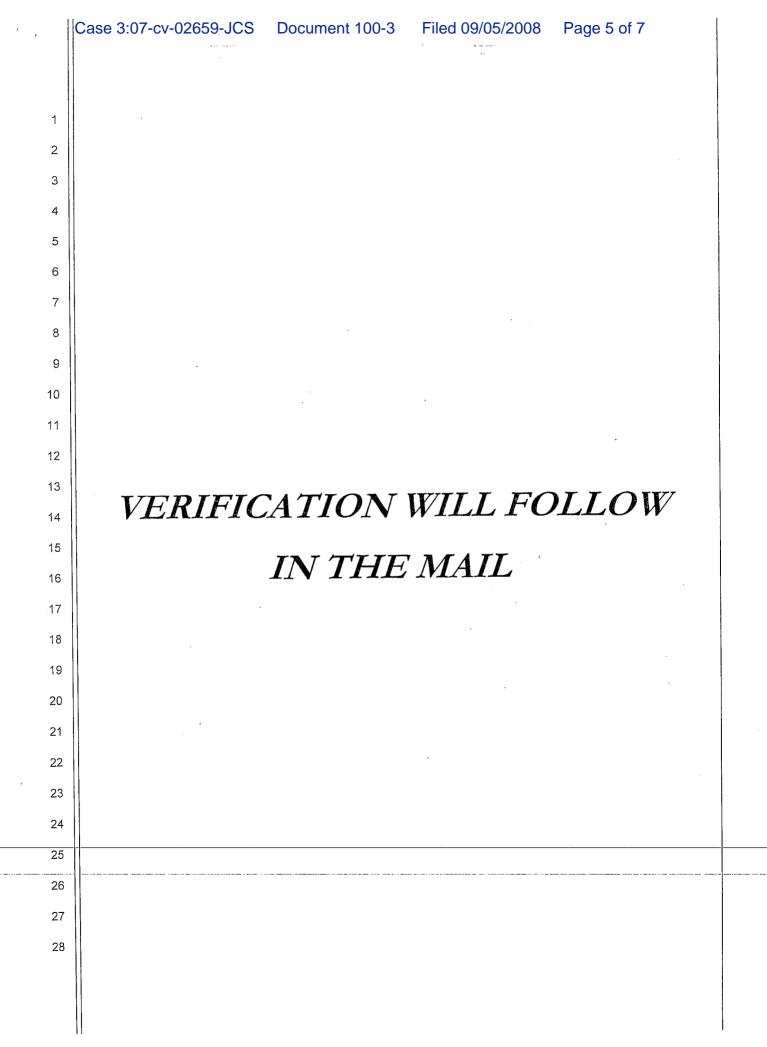
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	Case 3:07-cv-02659-JCS
1	INTERROGATORY No. 24:
2	See response to interrogatory No. 22, above.
3	INTERROGATORY No. 25:
4	Plaintiff suffered mental and emotional injuries as he was assaulted, battered, handcuffed and
5	unjustly arrested. The extend of his emotional injuries is unknown at the present time; discovery
6	continues.
7	Dated: November 20, 2007 LAW OFFICES OF STEVEN R. JACOBSEN
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9	(AR)
10	By CATHERINE R. DOUAT
11	Attorney for Plaintiff
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	RESPONSES TO INTERROGATORIES, SET ONE



PROOF OF SERVICE

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